

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

CHARLES BOCOCK
Plaintiff

v.

THOMAS J. DART
Defendant

19 CV 3877

**PLAINTIFF'S MOTION FOR APPOINTMENT OF COUNSEL
FOR LIMITED PURPOSE OF CONDUCTING DEPOSITIONS**

1. Plaintiff is a pretrial detainee currently held on house arrest.
2. Plaintiff is indigent as defined by federal law.
3. Plaintiff cannot seek any serious employment as he has no identification documents. His passport is in the possession of the Circuit Clerk of Cook County and his alien resident card ("green card") was in the possession of the Will County State's Attorney who have admitted that they have lost it. Plaintiff cannot obtain a new resident card without his passport.
4. Plaintiff has no hope of any income in the near future.
5. To vindicate his rights in this case, Plaintiff must depose witnesses with first-hand knowledge of activities at the Cook County Jail.
6. Federal rules require depositions to be conducted in the presence of a court reporter.
7. Defendant will not waive this right.
8. Defendant made a motion for waiver from this requirement, but this Court denied the request based on previous appellate rulings which do not permit such a waiver.
9. Since Plaintiff cannot afford a court reporter and the requirement cannot be waived, the only option remaining to vindicate the rights of Plaintiff and the other 5500 detainees at the jail is for counsel to be appointed for the limited purpose of conducting depositions.

WHEREFORE, Plaintiff requests that this Court to appoint counsel for the limited purpose of conducting depositions.

/s/ Charles Bocock

Charles Bocock, Plaintiff, Unrepresented
2510 W Maypole Ave
Chicago, IL 60612